

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 18-CR-144

ALBERT GOLANT,

Defendant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT PSR
OBJECTIONS**

Albert Golant, by counsel, moves the court to extend the deadline to submit objections to the PSR in this case. The current schedule has them due today, July 10. R. 28. The PSR had been ordered to be disclosed by July 3, 2019. The probation office inadvertently sent the report to an old email address of defense counsel on July 3 that counsel no longer has access to. After following up on Monday July 8, 2019, the probation office provided the defense with the draft PSR. The draft PSR has mistakes in its guideline calculations. Counsel has conferred with counsel for the government, AUSA Laura Kwaterski, who agrees that the draft PSR has mistakes in its guideline calculations. The delayed receipt of the report prevented counsel from reviewing it with Mr. Golant before July 10. The defense requests a few additional days to submit objections. The defense specifically asks to have

until Monday July 15, to submit objections. That will give the government sufficient time to respond and the probation office to get the final PSR to the Court by the July 29, 2019 deadline. We respectfully ask that the sentencing hearing remain scheduled for August 5, 2019.

Dated at Milwaukee, Wisconsin, this 10th day of July, 2019.

Respectfully submitted,

/s/ Joshua D. Uller

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